

# Holland & Knight

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August 10, 2021

## **Via ECF**

The Honorable J. Paul Oetken, U.S.D.J.  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007  
Courtroom: 706

*Re: FG Hemisphere Assocs., LLC v. Dem. Repub. of Congo, et ano.*, No. 19-mc-00232  
(JPO) – Letter Motion to Seal

Dear Judge Oetken:

We represent Plaintiff FG Hemisphere Associates, LLC (“Plaintiff”) in the above-referenced matter. We write pursuant to Rule 2(E) Your Honor’s Individual Rules and Practices to request permission to file an *ex parte* application under seal until Plaintiff’s application may be heard by the Court. As set forth in Plaintiff’s application, good and sufficient cause exists for immediate *ex parte* relief and due to the sensitive nature of the application, prior notice is impractical under the circumstances. Plaintiff’s respectfully request a hearing on its *ex parte* application at the Court’s earliest convenience. No previous request for the relief sought in the *ex parte* application has been made to this Court or any other court.

We are available at Your Honor’s convenience to discuss this matter in more detail. Thank you for your consideration of this request.

Respectfully submitted,

*Warren E. Gluck*

Warren E. Gluck  
*Counsel for Plaintiff*

cc: [OetkenNYSDChambers@nysd.uscourts.gov](mailto:OetkenNYSDChambers@nysd.uscourts.gov)  
All Counsel of Record (via ECF)